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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 Maria Caguicla,

15 vs.

16 Plaintiff,
17 Trans Union LLC; Experian
18 Information Solutions, Inc.; Equifax
19 Information Services LLC and
20 Comenity Bank,

21 Defendants.

22 Case No.: 2:24-cv-00055

23 **Discovery Plan and Scheduling**
24 **Order**

25 **Special Scheduling Review**
26 **Requested**

1 On March 1, 2024, Comenity Bank appeared in this case and the Court set a
2 deadline to file a proposed discovery plan and scheduling order by April 15, 2024.
3 Accordingly, Maria Caguicla and Comenity Bank (collectively as the “Parties”), by
4 and through their respective counsel, hereby submit this Joint Discovery Plan and
5 Scheduling Order. The parties will require 241 days of discovery measured from the
6 date that Comenity Bank filed its answer to Plaintiff’s complaint. Pursuant to LR 26-
7 1(a), the reason why a longer time period is requested is because counsel for
8 Comenity Bank will be in two separate trials on unrelated matters and requires more
9 time to conduct discovery in this matter, Plaintiff does not oppose the additional time
10 period.

14 **DISCOVERY PLAN**

15 The parties propose the following discovery plan and scheduling order:

16

17 1. Initial disclosures June 28, 2024

18 2. Amend pleadings and add parties .. July 29, 2024

19 3. Expert disclosures (initial): August 28, 2024

20 4. Expert disclosures (rebuttal): September 27, 2024

21 5. Discovery cutoff date: October 28, 2024

22 6. Dispositive motions: November 27, 2024

23 7. Pretrial order December 25, 2024

24 In the event that dispositive motions are filed, the date for filing the joint
25 pretrial order shall be suspended until **30 days after** decision on the dispositive
26 motions or until further order of the court.

1 Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any
2 objections thereto, shall be included in the joint pretrial order.

3 Extensions or Modifications of the Discovery Plan and Scheduling Order:
4 Applications to extend any date set by the discovery plan, scheduling order, or other
5 order must comply with the Local Rules.
6

7 Protective Order: The parties may seek to enter a stipulated protective order
8 pursuant to Rule 26(c) prior to producing any confidential documents.
9

10 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
11 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
12 served by sending such documents by email.
13

14 Alternative Dispute Resolution Certification: The parties certify that they met
15 and conferred about the possibility of using alternative dispute-resolution processes
16 including mediation, arbitration, and early neutral evaluation. The parties have not
17 reached any stipulations at this stage.
18

19 Alternative Forms of Case Disposition Certification: The parties certify that
20 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
21 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
22 The parties have not reached any stipulations at this stage.
23

24 Electronically Stored Information: The parties have discussed the retention
25 and production of electronic data. The parties agree that service of discovery by
26

1 electronic means, including sending original electronic files by email or on a cd is
2 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.
3

4 **Electronic evidence conference certification:** The parties further intend to
5 present evidence in electronic format to jurors for the purposes of jury deliberations
6 at trial. The parties discussed the presentation of evidence for juror deliberations but
7 did not reach any stipulations as to the method as this early stage.
8

9 Dated: April 16, 2024.

10 **FREEDOM LAW FIRM**

11 /s/ Gerardo Avalos

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17 /s/ Joseph P. Garin

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22 IT IS SO ORDERED.

23 
24 U.S. MAGISTRATE JUDGE

25 Date: April 16, 2024